

Appln. No.: 09/881,597  
Amendment dated June 13, 2006  
Reply to Office Action of March 22, 2006

#### REMARKS/ARGUMENTS

The Office Action of March 22, 2006, has been carefully reviewed and these remarks are responsive thereto. Reconsideration and allowance of the instant application are respectfully requested.

##### ***Rejections Under 35 U.S.C. § 103***

Claims 1-6, 11-15, 17, 18, 20-41, and 43-49 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Pat. No. 6,925,595 to Whitledge *et al* (hereinafter *Whitledge*), in view of U.S. Publ. No. 2002/0091738 to Rohrbaugh *et al*. (hereinafter *Rohrbaugh*). Applicant respectfully traverses this rejection for at least the following reasons.

Claim 1 recites, in part, “wherein said converting is based on annotation of the authored content with markup information corresponding to one or more device feature values.” As the Office correctly notes, *Whitledge* does not teach this limitation. See the Office Action at page 3. However, the Office then alleges that *Rohrbaugh* teaches wherein said converting is based on annotation of the authored content with markup information corresponding to one or more device feature values at paragraphs 0053-0054, 0058-0059, and 0063. *Id.* Applicant disagrees with this characterization of *Rohrbaugh*.

In *Rohrbaugh*, the HTML content “conversion” takes place in two steps. First, the content from the HTML document is parsed to identify references to external objects such as embedded HTML frames and images, and those objects are retrieved through additional server requests. See *Rohrbaugh* at paragraph [0056]; Fig. 2A, steps 106-110. Second, the parent HTML document and the external objects retrieved are translated by an HTML translator into a scalar vector representation (e.g., simple vector format (SVF)). See *Rohrbaugh* at paragraph [0058]; Fig. 2A, steps 114-116. The decision to make this “conversion” is based either on the use of a proxy client or based on a content-type specified in the request. See *Id.* at paragraphs [0050], [0063]. *Rohrbaugh*’s conversion from HTML into a simple vector representation is not “based on annotation of the authored content with markup information corresponding to one or more device feature values,” as recited in claim 1 (emphasis added). *Rohrbaugh* discloses no markup language that corresponds to device feature values; it teaches only typical HTML or XML tags

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used to describe the web page content. See *Rohrabaugh* at paragraphs [0054], [0063]. Thus, neither *Whitledge*, *Rohrabaugh*, nor their proposed combination teaches or suggests, “wherein said converting is based on annotation of the authored content with markup information corresponding to one or more device feature values,” as recited in claim 1 (emphasis added). Accordingly, claim 1 is not obvious over the cited references. Dependent claims, 2-6 and 8-17 are allowable for at least the same reasons, as well as based on the additional features recited therein.

Similarly, independent claims 18 and 25 recite content comprising information for displaying said content, “in compliance with author intent on a plurality of devices having different display characteristics.” Independent claim 32 similarly recites, “annotations within the device independent content ... wherein said annotations specify an intent of the content author for the one or more display feature values on a plurality of devices having different display characteristics.” Thus, as discussed with respect to claim 1, neither *Whitledge* nor *Rohrabaugh* teaches or suggests markup information, annotations, or content, which specify author intent “on a plurality of devices having different display characteristics.” Thus, claims 18, 25, and 32 are not obvious in view of the cited references. Their respective dependent claims, 20-24, 26-31, 33-41, and 43-19, are also allowable for at least the same reasons, as well as based on the additional features recited therein.

Claims 8-10, 17, 30, and 43 are further distinguishable from the cited references. As previously discussed in the Amendment submitted January 3, 2006, *Whitledge* fails to teach or suggest converting content by invoking said markup information. Rather, *Whitledge* converts content based on conversion preferences stored in an external database. See *Whitledge*, col. 8, lines 10-13. Further, with respect to claim 17, contrary to the Office’s assertion, *Whitledge* clearly does not provide an indication that the authored content has a bi-axially free form characteristic.

Claim 16 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over *Whitledge*, in view of *Rohrabaugh*, in further view of U.S. Pat. No. 6,523,040 to Lo *et al*. (hereinafter *Lo*). This rejection is traversed, as *Lo* fails to overcome the deficiencies of *Whitledge* and *Rohrabaugh* discussed above with respect to independent claim 1.

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**CONCLUSION**

All rejections having been addressed, Applicant respectfully submits that the instant application is in condition for allowance, and respectfully solicits prompt notification of the same. However, if for any reason the Examiner believes the application is not in condition for allowance or there are any questions, the Examiner is requested to contact the undersigned at (202) 824-3153.

Respectfully submitted,

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Dated this 13<sup>th</sup> day of June, 2006

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